

Joseph R. Saveri (State Bar No. 130064)  
Cadio Zirpoli (State Bar No. 179108)  
Christopher K.L. Young (State Bar No. 318371)  
Kathleen J. McMahon (State Bar No. 340007)

**JOSEPH SAVERI LAW FIRM, LLP**

601 California Street, Suite 1000

San Francisco, California 94108

Telephone: (415) 500-6800

Facsimile: (415) 395-9940

Email: jsaveri@saverilawfirm.com  
czirpoli@saverilawfirm.com  
cyoung@saverilawfirm.com  
kcmcmahon@saverilawfirm.com

Matthew Butterick (State Bar No. 250953)

1920 Hillhurst Avenue, #406

Los Angeles, CA 90027

Telephone: (323) 968-2632

Facsimile: (415) 395-9940

Email: mb@buttericklaw.com

*Counsel for Individual and Representative Plaintiffs  
and the Proposed Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, Sarah Silverman, and  
Christopher Golden,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.

Defendant.

**Case No. 3:23-cv-03417-VC**

**DECLARATION OF JOSEPH R. SAVERI IN  
SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER CASES SHOULD BE  
RELATED (L.R. 3-12, 7-11)**

Michael Chabon, David Henry Hwang, Matthew  
Klam, Rachel Louise Snyder, and Ayelet  
Waldman,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.

Defendant.

**Case No. 3:23-cv-04663-DR**

**DECLARATION OF JOSEPH R. SAVERI IN  
SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER CASES SHOULD BE  
RELATED (L.R. 3-12, 7-11)**

Case No. 3:23-cv-03417-VC

DECLARATION OF JOSEPH R. SAVERI IN SUPPORT OF PLAINTIFFS' ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER CASES SHOULD BE RELATED (L.R. 3-12, 7-11)

I, Joseph R. Saveri, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I am a partner and founder of the Joseph Saveri Law Firm, LLP (“JSLF”), counsel of record for Plaintiffs Richard Kadrey, Sarah Silverman, and Christopher Golden in this matter (the “*Kadrey Action*”). I have personal knowledge of the matters stated herein and, if called upon, could competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 in support of Plaintiff’s Administrative Motion to Consider Whether Cases Should be Related.

2. Attached hereto as **Exhibit A** is a true and correct copy of the Complaint in *Chabon, et al. v. Meta Platforms Inc.*, No. 4:23-cv-04663-DR, (N.D. Cal., Sept. 12, 2023) (the “*Chabon Action*”), The Complaint asserts that Defendant Meta Platforms Inc. engaged in actions related to the creation, maintenance, and operation of LLaMA, Defendant’s large language model artificial intelligence product that Plaintiffs allege violated their rights under Direct Copyright Infringement (17 U.S.C. § 106), Vicarious Copyright Infringement (17 U.S.C. § 106), the Digital Millenium Copyright Act – Removal of Copyright Management Information (17 U.S.C. § 1202 (b)), California’s Unfair Competition Law (Cal. Bus. & Prof. Code §§ 17200, *et seq.*), and California Negligence, and Unjust Enrichment law.

3. Civil Local Rule 3-12 requires that this Administrative Motion to Consider Whether Cases Should be Related be promptly filed. The Plaintiffs in the *Chabon Action* filed their complaint on September 12, 2023.

4. This Motion is unopposed by both the Defendant Meta Platforms Inc. and the Plaintiffs in the *Chabon Action*.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of September 2023 at San Francisco, California.

/s/ Joseph R. Saveri

Joseph R. Saveri